

NEWMAN & GREENBERG LLP **MEMO ENDORSED**
ATTORNEYS
950 THIRD AVENUE
NEW YORK, NEW YORK 10022
TEL. (212) 308-7900

RICHARD A. GREENBERG
STEVEN Y. YUROWITZ

GUSTAVE H. NEWMAN (1927-2017)

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WILLIAM J. DOBIE

September 8, 2022

By ECF

Hon. Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY, 10601

Re: *United States v. Leon Klein*, 19-cr-881

Dear Judge Karas:

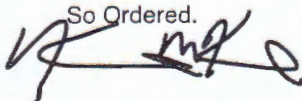
As the government previously informed the Court, we have reached a resolution in this matter, and the Court referred the plea to be conducted before a Magistrate Judge. With the government's consent, I am writing to respectfully request that Your Honor make a finding that the plea in this case satisfies the legal standard under the CARES Act to allow the plea proceeding to be held via videoconferencing.

Under the CARES Act provides that felony pleas may be held via video-conference if the District Judge "in a particular cases finds for specific reasons that the plea ... in that case cannot be further delayed without serious harm to the interests of justice." § 15002(b).

As Your Honor is well aware, Mr. Klein suffers from a host of medical issues. Moreover, this past month he had another surgical procedure and the recovery has been more difficult than Mr. Klein anticipated. An in-person plea would present real health risks. And, a delay until it is safe to hold in-person proceedings may result in a delay of months until Mr. Klein can enter his plea, and a concomitant delay in the ultimate resolution of his case. For this reason, we respectfully request that Your Honor make the requisite finding under the CARES Act to allow Mr. Klein's plea to be held by videoconference.

Granted. Given Mr. Klein's documented health issues, the Court finds that the upcoming plea proceeding may proceed via video teleconference, as an in-person appearance could jeopardize Mr. Klein's health and further delay would cause serious harm to the interests of justice.

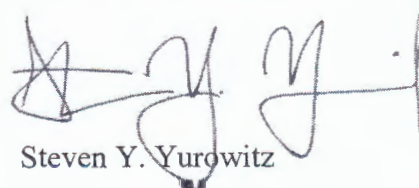
So Ordered.



9/8/22

cc: AUSA Shiva Logarajah

Respectfully submitted,


Steven Y. Yurowitz